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BY ECF ONLY

March 30, 2017

Hon. Judge Gary R. Brown , U.S.D.J.
United States District Court, E.D.N.Y
100 Federal Plaza
P.O. Box 9014 Room 840
Central Islip, New York 11722

Re: Rakeman et. al. v. MLD Mortgage. et al., 16 cv 0453(JFB)(GRB)

Dear Honorable Judge Brown:

Defendants' counsel with the consent of the named party defendants submit this letter as a motion to be relieved as counsel for the Defendants MLD MORTGAGE INC. and LAWRENCE DEAR. Defendants' counsel seeks to be relieved as counsel on this matter due to multiple health conditions that may impede in his ability to fully represent the Defendants.

Defendants' motion will substantiate the reasons that this motion should be granted because since October 2016 I have underwent three medical procedures and one major surgical procedure which required multiple lengthy stays in the hospital. Furthermore, I am scheduled to have another major surgery this upcoming month that may result in another hospital stay.

Defendants' counsel request for an order staying these proceedings for a moderate period - 60 days, or for such other time as this honorable Court may deem appropriate - as an accommodation to Defendants, in the event that the Court grants the above-discussed motion to withdraw as counsel.

Therefore, for the reasons set forth above, Defendants' counsel respectfully submits that a Motion to be relieved as Counsel and For a Stay is meritorious and should be granted.

Thank you.

Respectfully submitted,

/s/ *Thomas D. Gearon*

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